

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DENNESS R. ELLIS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. 2:06-CV-00421-WKW
	)	
LIBERTY MUTUAL FIRE INSURANCE	)	
COMPANY, et al.,	)	
	)	
Defendants.	)	

**JOINT MOTION TO REMAND**

Come now the parties of record and file this joint motion to remand for the reasons set forth below:

1. The parties have attached a Joint Stipulation of Facts outlining the relevant facts of this action as Exhibit A.
2. The parties agree that the amount in controversy does not exceed \$74,999.00, which effectively renders this Court without subject matter jurisdiction.
3. Plaintiff has agreed to withdraw her motion for imposition of attorney's fees currently pending before this Honorable Court.

Respectfully submitted this 23rd day June, 2006.

/s/ Joseph T. Carpenter  
JOSEPH T. CARPENTER  
Attorney for Liberty Mutual Fire Insurance Co.

OF COUNSEL:

Carpenter, Ingram & Mosholder, LLP  
303 Sterling Centre  
4121 Carmichael Road  
Montgomery, AL 36106  
Telephone: (334) 213-5600

/s/ Christina D. Crow  
CHRISTINA D. CROW  
Attorney for Denness R. Ellis

OF COUNSEL:

Jinks, Daniel & Crow, P. C.  
P. O. Box 330  
Union Springs, AL 36089  
Telephone: (334) 738-4225